

## REMARKS

Claims 1-13 and 17-21 are pending in the application. Herein, applicant amends independent claims 1, 17, and 21.

### Section 102 Rejections

In the Office Action, the Examiner rejects claims 1, 2, 4-7, 11, and 21 under 35 USC §102(b) as being anticipated by US patent no. 4,128,478 ("Metzger"). Independent claims 1 and 21 are discussed below.

#### A. Response to §102 Rejection of Independent Claim 1.

The applicant has amended claim 1 to indicate that a washing fixture is used to direct liquid into a washing basin. The liquid passes from the basin into a trap vessel through a drain line and then from the trap vessel into a filter vessel through a feed line. A pump draws liquid from the filter vessel through a draw line and pumps the liquid into the wash line and to the washing fixture.

To be anticipated under §102, each limitation of a claim must be taught by the reference. The applicant respectfully submits that Metzger does not teach all of the limitations of amended claim 1, and therefore cannot anticipate the claimed invention. For example, Metzger does not teach a draw line connecting the pump to the filter vessel as claimed. Rather, Metzger teaches a conduit (30) connected to a reservoir (26) and to a pump (27). The pump (27) in Metzger draws liquid from the reservoir (26) through conduit (30) and pumps it through a second conduit (31) into to a filter (35) (See Metzger, col. 2, lns. 43-48, duplicated below).

Solvent is provided to the flexible hose 25 from a reservoir barrel or receptacle 26 by means of a pump 27.  
45 The pump 27 pumps the solvent through a conduit 30 into the pump and through a conduit 31 through a valve 32 thence into a filter 35 and then through a flexible hose 36 coupled to the hose 25. The pump 27 is prefera-

In sharp contrast to Metzger, the claimed invention has a draw line through which cleaning liquid is drawn from a filter vessel by a pump. The pump pumps the liquid drawn from the filter vessel to a wash line. It is essential to the operation of the claimed invention that a draw line be used to draw liquid from the filter vessel. Using a draw line to draw liquid from the filter vessel allows the claimed invention to make advantageous use of settling of particulate matter in the filter vessel. As discussed in the specification, the filter vessel may make use of settling to prevent recirculation of fine matter in the cleaning liquid. See, for example, page 8, lines 8-10, reproduced below.

"The filter bucket 21 contains a filter bag or other filtering mechanism to further remove particulate matter from the water [or] cleaning liquid and also may allow further settling and collection of finer matter."

The use of settling in the filter vessel is also discussed at, page 13, lines 9-13, reproduced below.

"It will also be understood that more than one filter vessel may be used, with different filtering process performed in each successive vessel. For example, a first filter vessel may provide for silt settling, while other vessel or vessels provide for filtering with finer filters."

Further discussion of the use of settling in the filter vessel is had at page 13, lines 16-19, reproduced below.

"The feed line 136 connects to a manifold positioned inside the filter vessel 121. The manifold 142 acts to evenly distribute the water or cleaning liquid into the filter vessel 121 to reduce disturbance to the liquid. In this way, settling is facilitated."

To make use of settling in the filter vessel, the claimed invention has a draw line for drawing liquid from the filter vessel. Drawing from the filter vessel rather than pumping into it facilitates reduced turbulence and increased settling. If, as taught in Metzger, a pump were positioned to draw from the trap vessel and pump through the filter vessel and into a wash line, significant turbulence would be created in the filter vessel. Excessive turbulence in the filter vessel would prevent the settling of particulate matter and cause the matter to be re-circulated through the cleaning system. Accordingly, the washing system would be less effective.

Further, the applicant wishes to draw the Examiner's attention to an articulated difference between the meaning of the verbs "draw" and "pump" as used in the specification of the claimed invention. While the language of the claims govern the scope of the invention, the meaning of the terms in the claims must be considered in context of the application. Phillips v. AWH Corp., 415 F.3d 1303, 1313 (Fed. Cir. 2005). In context, the specification of the claimed invention makes a clear distinction between the action of drawing a liquid from a vessel and pumping a liquid out from a pump. See, for example, page 25, lines 17-21, reproduced below.

"In this way, relatively cleaner and filtered water or cleaning liquid is drawn from draw inlet 357 into draw line 338 and into pump 323. The cleaning liquid or water then is pumped by the pump 323 into wash line 340 for recycling through washer 312."

In the context of the specification, the verb "draw" is used to indicate the action of pulling or suctioning liquid into a pump. The verb "pump" is used to indicate the action of causing the liquid to flow out away from the pump under pressure. Given this distinction, the applicant respectfully submits that Metzger does not teach a pump connected to a filter vessel by a draw line as stated in the office action. Rather, Metzger teaches a pump connected to a reservoir with a

conduit acting as a draw line. The claimed invention draws from the filter. Metzger pumps into the filter.

Since Metzger fails to disclose at least the limitation of having a draw line connected to a pump and a filter vessel, the applicant respectfully submits that Metzger cannot anticipate independent claim 1 or its dependent claims 2-13. Being unanticipated, applicant submits that claim 1 is in condition for allowance.

#### B. Response to §102 Rejection of Independent Claim 21.

The applicant has amended claim 21 to indicate that a spray nozzle is used to direct liquid into a sink. The liquid passes from the sink into a trap bucket through a drain pipe and then from the trap bucket into a filter bucket through a feed pipe. A pump draws liquid from the filter bucket through a draw pipe. As discussed with respect to the rejection of independent claim 1 in section A, Metzger fails to disclose at least the limitation of having a draw line connected to a pump and a filter vessel. Accordingly, the applicant respectfully submits that Metzger cannot anticipate independent claim 21. Being unanticipated, applicant submits that claim 21 is in condition for allowance.

#### C. Response to §102 Rejection of Dependent Claims 2, 4-7, and 11.

Each of the dependent claims rejected under §102 are dependent upon currently amended independent claim 1. As discussed in section A, applicant respectfully submits that currently amended claim 1 is in unanticipated by Metzger. Applicant submits that dependent claims 2, 4-7, and 11 are therefore also unanticipated by Metzger and in condition for allowance.

#### Section 103 Rejections

In the Office Action, the Examiner rejects claims 3, 8-10, 12, 13, and 17-20 under 35 USC §103 as being unpatentable over Metzger in view of other patents and published patent applications.

D. Response to §103 Rejections of Dependent Claims 3, 8-10, 12, and 13.

As discussed in section A of this response, applicant believes that amended independent claim 1 is not anticipated by Metzger and thus is in condition for allowance. Applicant respectfully submits that the balance of the claims dependent upon currently amended claim 1 and are therefore allowable due to their dependence from an allowable claim. Neither Metzger alone, nor a combination of Metzger with the other references teaches each limitation of independent claim 1. Accordingly, Metzger alone or in combination cannot teach all the limitations of independent claim 1 and its dependents. However, even if the combination of Metzger and another reference taught each limitation of claim 1 and a dependent claim, the combination would be improper for failure of teaching, suggestion, or motivation to combine. The claimed invention, if practiced in view of Metzger alone would be inoperable. Metzger places a pump between its reservoir and its filter. If a pump were introduced into the claimed invention between the trap vessel and the filter vessel, the system would cease to function in its described manner. The introduced pump would have to generate enough pressure to pump cleaning liquid through the filter vessel and through the wash line. This much pressure would cause liquid from the filter vessel to pass through the bleed line and spill out uselessly into the washing basin. Cleaning liquid would not pass through the wash line into the washing fixture. The system would cease to function as described in the specification. Applicant respectfully submits that dependent claims 3, 8-10, 12, and 13 are in condition for allowance due to their dependence on currently amended independent claim 1.

E. Response to §103 Rejections of Independent Claim 17.

The applicant has amended claim 17 to indicate that a spray nozzle is used to direct liquid into a sink. The liquid passes from the sink into a trap bucket through a drain pipe and then from the trap bucket into a filter bucket through a

feed pipe. A pump draws liquid from the filter bucket through a draw pipe. As discussed with respect to the rejection of independent claim 1 in section A, Metzger fails to disclose at least the limitation of having a draw pipe connected to a pump and a filter vessel. Hilgren also fails to teach this limitation and is cited for the proposition of having a support structure and wheels. As discussed in section D, even if a teaching, suggestion, or motivation to combine the references existed, the references fail to collectively teach each limitation of independent claim 17. Accordingly, applicant submits that currently amended independent claim 17 is in condition for allowance.

E. Response to §103 Rejections of Dependent Claims 18-20.

As discussed in section E, applicant submits that independent claim 17 is in condition for allowance as being non-obvious in light of the cited art. Accordingly, applicant respectfully submits that dependent claims 18-20 are also in condition for allowance because of their dependence on independent claim 17.

**CONCLUSION**

Applicant respectfully submits that pending claims 1-13 and 17-21 are now in a condition for allowance.



Respectfully submitted,

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